

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

GREATER BIRMINGHAM MINISTRIES,

Plaintiff,

v.

JOHN H. MERRILL, in his official capacity
as Secretary of State of the State of Alabama,

Defendant.

Case No. 2:22-cv-00205-MHT-SMD

**PLAINTIFF GREATER BIRMINGHAM MINISTRIES' NOTICE OF
RELEVANT AUTHORITY**

Plaintiff Greater Birmingham Ministries (“GBM”) hereby gives notice of legal authority relevant to this litigation: *CLC v. Scott*, No. 1:22-cv-92-LY, Doc. No. 55, Findings of Fact and Conclusions of Law (W.D. Tex. Aug. 2, 2022). In *CLC v. Scott*, following a bench trial, the Western District of Texas ordered Texas Secretary of State John B. Scott to produce records responsive to the National Voter Registration Act (“NVRA”) requests made by several plaintiffs-organizations. The requested records pertain to a state program that threatens to remove registered voters from the voter rolls based on data allegedly showing their non-citizenship. In *CLC v. Scott*, Defendant Scott, like Defendant Merrill here, argued that he was not required to transmit electronic records under the NVRA’s Public Disclosure Provision. The district court rejected the Secretary’s “cramped view of the Act’s public-disclosure provision” and ordered electronic transmission of the requested records. The Findings of Fact and Conclusions of Law, and the accompanying mandatory injunction and final judgment, are attached hereto as exhibits.

Date: August 4, 2022

By: /s/ Danielle Lang

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CERTIFICATE OF SERVICE

I certify that, on August 4, 2022, I filed the foregoing document electronically via the Court's CM/ECF system, which will send a copy to the following counsel of record: Jim.Davis@AlabamaAG.gov; Misty.Messick@AlabamaAG.gov; and Ben.Seiss@AlabamaAG.gov.

/s/ Danielle Lang
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